

LOCAL BANKRUPTCY FORM 9013-4

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

IN RE:

Anna McHenry

CHAPTER 13

CASE NO. 4-23-bk-00255-MJC

Debtor(s)

Anna McHenry

**ADVERSARY NO. ap-
(if applicable)**

Plaintiff(s)/Movant(s)

VS.

Wilmington Savings Fund Society, FSB d/b/a
Christiana Trust as Trustee for PNPMS Trust III

Nature of Proceeding: Motion to

Determine Post-Petition Mortgage Fees

Defendant(s)/Respondent(s)

REQUEST TO CONTINUE HEARING/TRIAL WITH CONCURRENCE¹

This request must be filed at least twenty-four (24) hours prior to the hearing. All requests must be approved by the Court. Submitting a request is not an automatic continuance.

The undersigned hereby requests a continuance with the concurrence of the opposing party (parties). This is a first request for a continuance.²

Reason for the continuance.

Movant's counsel has a scheduling conflict.

Additionally, Movant is preparing to file an Adversary Proceeding related to this Motion and will subsequently file a Motion to Consolidate the matters as they deal with the same underlying facts. As such, the case is not ready to proceed on 6/27/24.

Contemporaneous with the filing of this request, the undersigned has served a copy of this request upon all counsel participating in this proceeding.

Dated: 6/24/2024

/s/ Patrick J. Best

Attorney for Movant

Name: Patrick J. Best

Phone Number: 570-420-7431

¹ No alterations or interlineations of this document are permitted.